Abstract

Designation as a Foreign Terrorist Organization ("**FTO**") is a political strategy that is weakly enforced due to difficulty in attributing terrorist acts to the FTO, the rising use of "leaderless resistance" or lone wolf terrorism, and geopolitical allyship. Sanctions against convicted or charged terrorists espousing ideology in line with that of an FTO can better serve punitive and deterrent functions, but requires rigorous maintenance and is more labor intensive across several government agencies including the State Department, the Department of Commerce, the Department of Homeland Security, Customs and Border Patrol, the Department of the Treasury, and requires collaboration with the United Nations, ally governments, and foreign law enforcement agencies investigating suspected terrorist acts. In this paper, the designation and removal of Kahane Chai and its aliases, the legitimization of the terrorist ideology by incorporation into mainstream politics, and the Executive Order for sanctions against convicted persons violently expressing the ideology of Kahane Chai ("**Kahanists**") will serve as a case study to compare FTO designation to sanctions on convicted or charged terrorists.

I. The history and ideology of Kahanists.

Rabbi Meir Kahane ("**Kahane**") was an American-born Israeli Orthodox rabbi who founded the violent[1] extremist group Jewish Defense League ("**JDL**") in the United States before emigrating to Israel where he later served one term in the Knesset, representing his far-right Kach party ("**Kach**"). Kahane was an ultra-nationalist who called for immediate Jewish mass migration to Israel and annexation of the West Bank and the Gaza Strip,[2] and was vehemently opposed to the Soviet policy barring Soviet Jews from emigrating to Israel.[3] Kahane believed non-Jews in Israel were not entitled to equal rights, fair representation, voting rights, or citizenship, concluding that "western democracy was simply incompatible with Zionism and its central idea of a Jewish State."[4] Kahane also espoused the concept of combatting Arab terrorism with Jewish terrorism or *lex talionis*.[5] Kahane's ideology was

[1] The FBI attributed at least 20 bombing incidents to JDL in the 1980s through the United States https://www.fbi.gov/stats-services/publications/terrorism-2002-2005; The FBI later referred to acts planned by the JDL as "domestic terrorism" https://www.fbi.gov/stats-services/publications/terror, pg 18.
[2] Rabbi Meir Kahane, *They Must Go.* https://ia804508.us.archive.org/34/items/TheyMustGoMeirKahane/They%20Must%20Go%20Meir%20Kahane.pdf (1980)
[3] Rabbi Meir Kahane, *Uncomfortable Questions for Comfortable Jews.* Lyle Stuart Inc., (1987), https://archive.org/details/uncomfortableque00kaha/page/n4/mode/1up pg 269: "There are no Soviet Jews or Syrian Jews or American Jews. There are only Jews who live in the Soviet Union or in Syria or in America. There is one Jewish people, indivisible, that the Jewish State, which has the power and expertise and professionalism, is obligated to defend in every way, across and within any border. When the State of Israel demands support, monetarily and politically, from Jews all over the world — and properly so — it is because Israel is the Jewish State."
[4] *Id.* at 45.
[5] Raphael Cohen-Almagor, *Vigilant Jewish fundamentalism: from JDL to Kach,* (1992), Terrorism and Political Violence, page 47.

one that sought to restore "a sense of Jewish power and the right to dominance."[6] Prior to Kach being banned from the Knesset, Kahane proposed legislation stipulating that non-Jews "assume duties, taxes, and slavery" or be deported, banning non-Jews from living within the city of Jerusalem, implementing complete segregation of Jews and enslaved non-Jews, and miscegenation laws imposing 50-year prison sentences for non-Jews engaging in sexual activity with Jews.[7] The *halakhic* concepts Kahane espoused banning intermarriage, conversion of secular Jews, segregation, ethnic cleansing, and resistance to the American Jewish Establishment and "Hellenistic Jews" evolved into the Israeli political ideology of "assimilation" today.[8] Kahane praised four of his JDL and Kach members, Yehudah Richter, Levi Chazen ("**Chazen**"), Meir Leibovitz, and Craig Arthur Aviel Leitner ("**Leitner**") as "sanctifying the name of God" in 1984 when they ambushed a bus of non-Jews in the West Bank with automatic weapons.[9] Richter, Chazen, Leibovitz, and Leitner, along with Mike Guzovsky ("**Guzovsky**") were part of a Kahanist *lex talionis* group called Terror Neged Terror ("**TNT**") based largely out of settlements around the West Bank city of Hebron and formed after some members fled the U.S. to evade prosecution for their involvement with the JDL.[10] TNT was largely motivated by the Camp David peace accords and expressed their anti-Arab sentiments by burning Palestinian cars, throwing Molotov cocktails at homes and businesses in the West Bank, and violently attacking Palestinian civilians.[11] Kahane expressed that his supporters should not engage in these terrorist acts, not because they were morally wrong and ineffective, but because "they would be hunted down."[12] After his political career, Kahane focused on speaking engagements, the Yeshiva *HaRa'ayon HaYehudi* (ישיבת הרעיון היהודי or "the Jewish Idea Yeshiva") he founded to teach his "Authentic Jewish Idea," and writing books on his controversial religious and political philosophies, such as "Why Be Jewish: Intermarriage, Assimilation, and Alienation," "They Must Go," "Never Again!" and "Uncomfortable Questions for Comfortable Jews." Kahane was assassinated in 1990.

Following Kahane's assassination, the Kach party split into two similar factions – Kach lead by Baruch Marzel ("**Marzel**"), No'am Federman ("**Federman**"), and Tiran Pollak, and Kahane Chai

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[6] Susannah Heschel, *Meir Kahane and Race as Incarnational Theology*. J RELIG ETHICS, 50(2):167-325, 2022.
[7] James Zogby, *Netanyahu Is Letting Israel's Fascists Enter by the Front Door*, THE NATION, (23 March 2021), https://www.thenation.com/article/world/israel-kahane-biden-fascist/.
[8] Erik Magnusson, *Frightening proportions: on Meir Kahane's assimilation doctrine.* NORDISK JUDAISTIK, 23(2):36-53, 2021 doi: https://doi.org/10.30752/nj.107487.
[9] David K. Shipler, *3 Killed and 9 Hurt by Bomb on Bus in an Israeli Port,* NEW YORK TIMES, (8 March 1984), https://www.nytimes.com/1984/03/08/world/3-killed-and-9-hurt-by-bomb-on-bus-in-an-israeli-port.html
[10] Ami Pedahzur & Arie Perlinger *Jewish Terrorism in Israel* (30 October 2009) Columbia University Press, page 89
[11] *Id.* at 90.
[12] David K. Shipler, *3 Killed and 9 Hurt by Bomb on Bus in an Israeli Port,* NEW YORK TIMES, (8 March 1984), https://www.nytimes.com/1984/03/08/world/3-killed-and-9-hurt-by-bomb-on-bus-in-an-israeli-port.html.

("**Kahane Chai**") lead by Guzovsky (who also goes by Yekutiel Ben-Yaakov), Kahane's son Binyamin Ze'ev Kahane ("**Binyamin**"), David Axelrod/Ha'ivri.[13]

During the time Kahane had a seat in the Knesset, Marzel had served as secretary of the Knesset faction of Kach, organized political activity, served as a Kach spokesman, and was occasionally thrown out of the Knesset building after receiving complaints of inciting racism.[14] Marzel continued in politics under various far-right party names including Herut, National Union, and Jewish National Front, but failed to secure a Knesset seat. Marzel formed his current party, Otzma Yehudit ("**Otzma Yehudit,**" or "Jewish power" in English) along with fellow former Kach members Michael Ben-Ari ("**Ben-Ari**") and Itamar Ben Gvir ("**Ben Gvir**") in 2012.[15] Ben-Ari had served in the Knesset from 2009-2012, where he was frequently accused of inciting racism, such as referring to Arab Israelis as "enemies from within" and as the "fifth column,"[16] calling for a Palestinian state but in France,[17] and stating that "infiltrators" who approach the border "will get a bullet in the head."[18] Federman, one of the other Kach leaders after Kahane's assassination, was also a notorious racist, but was not legitimized by politics – he was charged with crimes primarily in the West Bank including: attempting to hit an Arab with his car, chasing and kicking an Arab man, assaulting a U.S. embassy worker, [19] attacking a police officer, [20] and attempting to slaughter a goat at al-Aqsa mosque.[21]

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[13] Cabinet Communique (13 March 1994) https://embassies.gov.il/MFA/AboutIsrael/state/Law/Pages/Cabinet%20Communique%20-%20March%2013-%201994.aspx.

[14] Baruch Marzel – C.V. and Highlights of his Public Activities, archived at https://web.archive.org/web/20070716233403/http://www.hazit.co.il/Default.aspx?tabid=323.

[15] Lahav Harkov, *The new Kach? Ben-Ari, Marzel, Ben Gvir form party,* THE JERUSALEM POST, (28 October 2012), https://www.jpost.com/diplomacy-and-politics/the-new-kach-ben-ari-marzel-ben-gvir-form-party.

[16] Yotam Berger, *Israel's top court bans Kahanist leader from election run, okays Arab slates, far-left candidate,* HAARETZ, (17 March 2019), https://www.haaretz.com/israel-news/elections/2019-03-17/ty-article/israels-top-court-bans-kahanist-leader-from-running-approves-arab-slate/0000017f-e642-df5f-a17f-ffde8b190000.

[17] Ben Hartman, *MK Ben-Ari calls for Palestinian state in France,* THE JERUSALEM POST, (5 December 2012), https://www.jpost.com/diplomacy-and-politics/mk-ben-ari-calls-for-palestinian-state-in-france.

[18] Ari Kaufman, *Right-wing MK: "Shoot border infiltrators in the head,"* +972 MAGAZINE, (23 September 2012), https://www.972mag.com/right-wing-mk-shoot-border-infiltrators-in-the-head/.

[19] Amy Klein, *Federman charged with attempted assaults,* THE JERUSALEM POST, (2 September 1998), archived at https://web.archive.org/web/20160225011016/https://www.highbeam.com/doc/1P1-16987001.html.

[20] Nir Hasson, *No Prosecutor? Judge drops case against Noam Federman,* HAARETZ, (24 December 2010), https://www.haaretz.com/2010-12-24/ty-article/no-prosecutor-judge-drops-case-against-noam-federman/0000017f-e16c-d38f-a57f-e77efcb70000.

[21] Jonah Mandel, *Noam Federman stopped at Temple Mount with kid in tow,* THE JERUSALEM POST, (18 April 2011), https://www.jpost.com/breaking-news/noam-federman-stopped-at-temple-mount-with-kid-in-tow.

Guzovsky, was widely considered to be the U.S. head of Kahane Chai.[22] Heading Kahane Chai in Israel was Binyamin, an early resident of the settlement and *de facto* Kahane Chai headquarters Kfar Tapuah ("**Tapuah**"). Binyamin was convicted of sedition by the Supreme Court sitting as the High Court of Justice for failing to value "social cohesiveness" when he distributed pamphlets with the following language: "Why is it that every time a Jew is killed we shell Lebanon and not the hostile villages within the State of Israel? For every attack in Israel – bomb an Arab village – a nest of murderers in the State of Israel! Only Kahane has the courage to speak the truth!"[23] Binyamin was assassinated in 2000. Binyamin's nephew, Meir Ettinger ("**Ettinger**"), is considered an early member of the Hilltop Youth ("**Hilltop Youth**"), a Kahanist group of West Bank settlers who commit slews of "price tag" attacks on Palestinian homes and villages in the West Bank.[24] "Price tag" attacks are violent attacks on Palestinians and their property, exacted as a "price" or response to Israeli authorities efforts to dismantle illegal settlement outposts.[25] Ettinger has also produced a series of writings espousing his grandfather's ideology of removing non-Jews from Israel and creating a theocratic government and has been arrested dozens of times.[26]

II. Kahane Chai and its aliases were considered terrorist organizations as early as 1994.

In 1994, Kahanist member of the JDL and third on Kach's list for Knesset seats, Baruch Goldstein ("**Goldstein**"), opened fire on eight hundred Palestinians praying in Hebron's Ibrahimi Mosque, killing twenty-nine and wounding hundreds more.[27] When Kach spokesmen declared the attack "one of greatness,"[28] Israel subsequently declared Kahane Chai and Kach as terrorist organizations under Clause 8 of the 1948 Order for the Prevention of Terrorism.[29] Despite the formal designation, only a year later, Yigal Amir ("**Amir**"), a right-wing extremist, assassinated the Prime

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[22] Anti-Defamation League, *Extremism in the name of religion: the violent record of the Kahane movement and its offshoots,* (1995), archived at https://web.archive.org/web/20090529224701/http://www.adl.org/extremism/kahane1.pdf.
[23] *State of Israel v. Binyamin Kahane*, CrimFH 1789/98, https://versa.cardozo.yu.edu/sites/default/files/upload/opinions/State%20of%20Israel%20v.%20Kahane.pdf.
[24] Simona Weinglass, *Who is Meir Ettinger, the Shin Bet's no. 1 alleged Jewish nationalist?,* THE TIMES OF ISRAEL, (6 August 2015), https://www.timesofisrael.com/who-is-meir-ettinger-the-shin-bets-no-1-alleged-jewish-nationalist/.
[25] United Nations Office for the Coordination of Humanitarian Affairs, *The Price of a Law Enforcement Failure,* (11 January 2009), https://www.un.org/unispal/document/auto-insert-196484/.
[26] Blog of Meir Ettinger on HaKol Hayehudi, https://www.hakolhayehudi.co.il/blog/%D7%9E%D7%90%D7%99%D7%A8_%D7%90%D7%98%D7%99%D7%A0%D7%92%D7%A8.
[27] United Nations Security Council Resolution, *Measures to guarantee the safety and protection of the Palestinian civilians in territories occupied by Israel,* (18 March 1994), S/Res/904.
[28] Scott Kraft, *Extremists pay tribute to killer of 48 at funeral,* THE LOS ANGELES TIMES, (28 February 1994), https://www.latimes.com/archives/la-xpm-1994-02-28-mn-28250-story.html.
[29] Cabinet Communique, (13 March 1994), https://embassies.gov.il/MFA/AboutIsrael/state/Law/Pages/Cabinet%20Communique%20-%20March%2013-%201994.aspx.

Minister Yitzhak Rabin. At a protest of the Oslo Accords one month before the assassination, Ben Gvir was filmed brandishing Rabin's car's stolen hood ornament and promising to "get him too."[30]

The Antiterrorism and Effective Death Penalty Act of 1996 authorizes the State Department to designate an entity as an FTO if the Secretary of State finds that: (i) the organization is a foreign organization; (ii) the organization engages in terrorist activity or retains the capability and intent to engage in terrorist activity; and (iii) the terrorist activity threatens the security of U.S. nationals or U.S. national security.[31] The consequences of designation as an FTO are: (i) U.S. financial institutions in possession of or control over funds in which an FTO has an interest are to retain possession of or control over such funds[32] (largely enforced by the Department of the Treasury); (ii) it becomes a crime to knowingly provide, or conspire to provide, material support or resources to the FTO[33] (largely enforced by the Department of Justice); and (iii) non-national representatives of the FTO are ineligible to receive visas and admission to the U.S. (largely enforced by the Department of Homeland Security).[34] Under the Act, the U.S. designated Kahane Chai, Kach, and numerous other aliases (listed in Appendix A) as FTOs in 1997[35], 1999[36], 2001[37], and 2003[38]. Attorneys representing the groups petitioned for *de novo* review of the designation in 2004, resulting in redesignation in 2005.[39] The Intelligence Reform and Terrorism Prevention Act of 2004 changed the review procedure from required redesignation every two years to reviewing the designation upon petition or reviewing the designation every five years.[40]

Canada listed Kahane Chai and its aliases as terrorist entities on May 24, 2005, finding that its activities "included threats to government officials and infrastructure, grenade attacks, armed violence, and bombings" in the name of "expelling Arabs from Israel, expanding Israel's boundaries to include the occupied territories and parts of Jordan, and the strict implementation of Jewish law in Israel."[41]

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[30] Barton Gellman, *Israeli Prime Minster Rabin is killed*, THE WASHINGTON POST, (4 November1995), https://www.washingtonpost.com/archive/politics/1995/11/05/israeli-prime-minister-rabin-is-killed/2cca446e-33a8-4568-b156-2ecfdf18fe0a/.
[31] ANTITERRORISM AND EFFECTIVE DEATH PENALTY ACT OF 1996, PL 104-132, 24 April 1996, 110 Stat. 1214.
[32] 18 U.S.C. § 2339B (West).
[33] *Id*.
[34] 8 U.S.C. §1182 (West).
[35] DESIGNATION OF FOREIGN TERRORIST ORGANIZATIONS, 8 October 1997, 62 FR 52650-01.
[36] Office of the Coordinator for Counterterrorism; DESIGNATION OF FOREIGN TERRORIST ORGANIZATIONS, 8 October 1999, 64 FR 55012-01.
[37] REDESIGNATION OF FOREIGN TERRORIST ORGANIZATIONS, 5 October 2001, 66 FR 51088-01.
[38] REDESIGNATION OF FOREIGN TERRORIST ORGANIZATIONS, 2 October 2003, 68 FR 56860-03.
[39] REDESIGNATION OF FOREIGN TERRORIST ORGANIZATIONS, 28 January 2005, 70 FR 4186-01.
[40] INTELLIGENCE REFORM AND TERRORISM PREVENTION ACT OF 2004, PL 108-458, 17 December 2004.
[41] Public Safety Canada, *Currently listed entities,* https://www.publicsafety.gc.ca/cnt/ntnl-scrt/cntr-trrrsm/lstd-ntts/crrnt-lstd-ntts-en.aspx#42.

III. Several terrorist acts were attributed to Kahanists.

The 2005 redesignation of the group was appealed to the U.S. Court of Appeals for the District of Columbia Circuit, who affirmed the redesignation and published the declassified documents upon which the Secretary of State had made her decision.[42] These documents included: a newspaper article reporting harassment by right-wing protesters against a Shin Bet (Israeli's internal security agency) official, a news report of a "personal incitement campaign" against then-Prime Minister Ariel Sharon, a radio broadcast reporting the Director of the Shin Bet confirming threats to PM Sharon from Kahanist extremists, and a radio broadcast reporting death threats against the Israeli police officers investigating an attempted bombing by a Kach extremist.[43] The attempted bombing referenced by the State Department that instigated the death threats against the investigators was likely the April 29, 2002 car bomb between an Arab girls' school and a hospital in East Jerusalem for which Federman was arrested as the "brain behind the organization."[44] In addition to the attempted bombing, a former Israeli soldier who spent weekends under the influence of Kahanists in Tapuah, opened fire on a bus in an Arab city in northern Israel, killing four non-Jew Israeli citizens.[45] A member of the Kahanist Hilltop Youth was sentenced to eight years in prison for possession of weapons stolen from the Army after he led investigators to a West Bank weapons cache known to be used in the killings of many Palestinians.[46]

In 2005, the Disengagement Plan Implementation Law was enacted. The Law mandated the Israeli withdrawal from Gaza and four West Bank settlements, violating the core Kahanist tenet of Israel expansion and inflaming the already stressed tensions. Central to the anti-disengagement movement was the Gaza settlement Gush Katif, where Israelis refused to leave and West Bank settlers were bussed in to help resist the government action, many being charged and jailed.[47] One such settler was 14-year-old Ettinger, the future leader of the Hilltop Youth, who was brought to the protest by his mother, Kahane's daughter Tova.[48] During the summer 2005 anti-disengagement protests, Bezalel Smotrich ("**Smotrich**"), a 25-year-old West Bank settler, was arrested for suspicion of attempting to

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[42] *Kahane Chai v. U.S.*, 466 F.3d 125 (2006).
[43] *Id*. at 129.
[44] John Kifner, *Israel arrests settlers it says tried to bomb Palestinians,* THE NEW YORK TIMES, (19 May 2002), https://www.nytimes.com/2002/05/19/world/israel-arrests-settlers-it-says-tried-to-bomb-palestinians.html.
[45] Stephen Farrell, *Israeli killer was recruited to terror over the internet,* THE LONDON TIMES, (6 August 2005), Archived at https://web.archive.org/web/20110523234152/http://www.timesonline.co.uk/tol/news/world/middle_east/article552244.ece.
[46] Guy Leshem, *Jewish Terror Wave Puts Israel on Alert,* FORWARD NEWSPAPER, (2 September 2005), https://forward.com/news/2677/jewish-terror-wave-puts-israel-on-alert/.
[47] Elizabeth Rubin, *Girls at War,* TABLET MAGAZINE, (7 September 2011), https://www.tabletmag.com/sections/israel-middle-east/articles/girls-at-war.
[48] Associated Press, *Thousands protest Israel's Gaza withdrawal,* NBC NEWS, (27 June 2005), https://www.nbcnews.com/id/wbna8379455.

blow up a major highway from Gaza while in possession of 185 gallons of gasoline.[49] Ben Gvir, the future co-founder of Otzma Yehudit and Kach leaders Federman and Marzel served as prominent campaign organizers in the anti-disengagement movement.[50,51]

Ben-Ari, while serving in the Knesset, was denied a visa application into the U.S. in November 2009, due in part to his involvement in the 2005 Gaza anti-disengagement as a Kahanist,.[52] He was denied a visa again in 2012 on the grounds of belonging to a terrorist organization.[53] The consular committee denied Ben-Ari's application because he "openly considers himself a disciple and devotee of Kahane" and publicly advocates "racist Kahanist policies."[54]

From 2007 to 2008, the NYPD monitored Kahane Chai after frequent death threats against celebrity New York rabbi Shmuley Boteach were posted on a forum on Kahane.org – the threats served as the grounds to launch an infiltration deploying informants, but there has been no evidence that law enforcement implemented an infiltration or followed the FTO beyond monitoring internet forums.[55] The threats accused Boteach of desecrating (*chillul*) the name (*hashem*) of God, due in part to his vocal support of intermarriage, a practice Kahanists strongly oppose.[56]

IV. Kahane Chai and its aliases were downgraded to Specially Designated Global Terrorists in 2022.

On May 20, 2022, Secretary of State Anthony Blinken announced that after consultation with the Attorney General and the Secretary of the Treasury, he concluded that the "circumstances that were the basis for the designation of Kahane Chai (and other aliases) as a FTO have changed in such a

[49] Staff Writer, *Former Shin Bet deputy chief said to claim MK Smotrich planned terror attack,* THE TIMES OF ISRAEL, (18 March 2019), https://www.timesofisrael.com/former-shin-bet-deputy-chief-said-to-call-hardline-mk-smotrich-a-terrorist/.
[50] Greg Myre, *Israel gears up for a burst of far-right anger,* THE NEW YORK TIMES, (20 February 2005), https://www.nytimes.com/2005/02/20/world/middleeast/israel-gears-up-for-burst-of-farright-anger.html.
[51] Leslie Susser, *Days of Rage,* PBS FRONTLINE REPORT, (21 March 2005), accessed at https://www.pbs.org/wgbh/pages/frontline/shows/israel/extreme/days.html
[52] Maayana Miskin, *U.S. denies visa to MK Ben-Ari,* ISRAEL NATIONAL NEWS, (9 November 2009), https://www.israelnationalnews.com/news/134322.
[53] Jonathan Lis, *MK Ben Ari denied entry visa to U.S. over link to terrorist group*, HAARETZ, (24 February 2012), https://www.haaretz.com/2012-02-24/ty-article/mk-ben-ari-denied-entry-visa-to-u-s-over-link-to-terrorist-group/0000017f-e0b0-d804-ad7f-f1fa5e9a0000.
[54] Noah Siegel, *Otzma Party is dangerous. I know because I banned its leader from the U.S.,* THE JERUSALEM POST, (26 February 2019), https://www.jpost.com/opinion/otzma-party-is-dangerous-i-know-because-i-banned-its-leader-from-the-us-581759.
[55] Adam Chandler, *Secret NYPD documents reveal investigation into Boteach death threats,* TABLET MAGAZINE, (02 September 2013), https://www.tabletmag.com/sections/news/articles/nypd-boteach-death-threats.
[56] Shmuley Boteach, *Stop ostracizing the intermarried,* THE JERUSALEM POST, (22 July 2007), https://www.jpost.com/opinion/op-ed-contributors/stop-ostracizing-the-intermarried.

manner as to warrant revocation of the designation."[57] Kahane Chai and its aliases remain Specially Designated Global Terrorist ("**SDGT**") entities under 31 CFR § 594.310, in order to support law enforcement and to continue to freeze assets of "still active individual terrorists," which seemingly contradicts the State Department's statement that Kahane Chai is "no longer engaged in terrorism or terrorist activity and [does not] retain the capability and intent to do so."[58] Designation as an SDGT means that certain property within or under control by the U.S. may be blocked, travel may be restricted for certain persons meeting criteria, and the Department of the Treasury has derivative authority to designate additional individuals or entities providing support to established SDGTs.[59] The State Department applauded the success Israel has had "in defusing the threat of terrorism by these groups."[60] In actuality, Israel has not defused the threat of Kahanist terrorism, but has normalized the Kahanist ideology by incorporating it into mainstream political parties, and the actions that were once considered terrorism have now become common to the point of social acceptance. Additionally, through levels of incompetence, ignorance, and politicization, the U.S. enforcement agencies failed to enforce the FTO sanctions against Kahane Chai on multiple occasions.

V. Dilemmas of politicization, multiple aliases, and leaderless resistance lead to a designation that often went unenforced.

Throughout Kahane Chai's time as a designated FTO, there existed the dilemma of attributing terrorist acts in line with Kahanist ideology to the designated FTO and its aliases – a dilemma compounded by the simultaneous global rise in lone wolf terrorism and "leaderless resistance." The U.S. Court of Appeals for the District of Columbia Circuit addressed this dilemma in their 2006 decision by finding that when a threat is clearly identified as originating from Kahanist extremists, the Secretary of State "could reasonably infer that a Kahanist extremist is likely a member of Kahane Chai."[61] The second dilemma was that of the numerous aliases for the group, making it difficult to track the members, affiliations and funding in order to enforce the FTO consequences. Kenneth Piernick, former Acting Chief of International Terrorism Operations Section II, Counterterrorism Division, Federal Bureau of Investigation confirmed that aliases were used to "evade legal responsibility for their illegal activities" and that "Guzovsky simply changes the names of his groups,

[57] Notice by the State Department (20 May 2022) *In the Matter of the Designation of Kahane Chai (and Other Aliases) as a Foreign Terrorist Organization* FR Doc. 2022-10828.
[58] State Department Media Note, *Revocation of Five Foreign Terrorist Organizations Designations and the Delisting of Six Deceased Individuals as Specially Designated Global Terrorist* (20 May 2022).
[59] U.S. Embassy in Mauritania, *Terrorism Designations FAQs* (27 February 2018).
[60] State Department Media Note, Revocation of Five Foreign Terrorist Organizations Designations and the Delisting of Six Deceased Individuals as Specially Designated Global Terrorist (20 May 2022).
[61] *Kahane Chai v. U.S.,* 466 F.3d at 130.

newsletters, or fundraising entities, after they have been designated as being aliases for Kahane Chai/Kach in the Secretary of State's FTO designation" but that "the principal members, addresses, and telephone numbers utilized for the 'new' organizations remain the same."[62] The U.S. government agencies tasked with identifying the aliases/analogues and keeping the OFAC list updated were unsuccessful despite the long-held understanding that Kahane Chai's "amorphous membership links them to a number of smaller groups."[63] An unfortunate reality is that enforcement may have been ineffective because of political pressure – the U.S. and Israel have a long history as allies.

One such occasion when political pressure and the Israel-U.S. allyship may have taken precedence over enforcement was a fundraiser in New York City in December 2000 hosted by Guzovsky and Binyamin to raise money for the "Rabbi Meir Kahane Memorial Fund" an obvious alias that was not included in the State Department's FTO designation until 2003.[64] Guzovsky had returned to the U.S. to fundraise and rally for support of Kahane's quest to restore the biblical state of Israel and expel the Arabs from Israel. The base for Guzovsky's work was Brooklyn's Hatikva Jewish Identity Center, an alias that also was not included until 2003.

There is at least one 501(c)(3) tax-exempt organization blatantly fundraising for the Kahanist movement active as recently as 2020 – the American Friends of Yeshivat *HaRa'ayon HaYehudi*, EIN: 95-4175721, registered in Skokie, IL and listing JDL and TNT member Chazen as a director.[65] Yeshiva *HaRa'ayon HaYehudi* is the yeshiva located in Jerusalem at 11 Shmarya Street, founded by Kahane in 1987 and presided over by Rabbi Yehuda Kroizer ("**Kroizer**") today.[66] The State Department in their "Summary of the 2003 Administrative Record for Redesignation" cited to justify the redesignation "several students from the Kach yeshiva, *Hara'ayon Hayehudi*, have reportedly been arrested over the last two years on suspicion of involvement in terrorist activity," so it is unclear how this alias was overlooked and the 501(c)(3) has been able to fundraise for the Kahanists since 1988.[67] In 2012, Chazen hosted a banquet fundraiser for the yeshiva in Israel on the anniversary of Kahane's death – in attendance were Meir Weinstein ("**Weinstein**;" the founder of JDL in Canada and current leader of Kahanist group Israel Now), Ben-Ari, Baruch Ben-Yosef (a suspect in the 1985 murder of Alex Odeh

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[62] *Id.* at 131.
[63] Seva Gunitskiy, *In the Spotlight: Kach and Kahane Chai,* CENTER FOR DEFENSE INFORMATION, (1 October 2002), archived at https://web.archive.org/web/20061122094511/http://www.cdi.org/terrorism/kach.cfm.
[64] Dean E. Murphy, *Terror label no hindrance to anti-Arab Jewish group,* THE NEW YORK TIMES, (19 December 2000), https://www.nytimes.com/2000/12/19/nyregion/terror-label-no-hindrance-to-anti-arab-jewish-group.html.
[65] IRS Form 990EZ, *American Friends of Yeshivat Hara'ayon Hayehydi*, https://apps.irs.gov/pub/epostcard/cor/954175721_202008_990EZ_2021081118702938.pdf.
[66] Yeshiva website: http://www.haraayon.org/.
[67] Kahane CHAI, et al., Petitioners, v. UNITED STATES DEPARTMENT OF STATE and Honorable Condoleezza Rice, Secretary of State, Respondents., 2006 WL 1354333, at *38.

by the JDL), and Lenny Goldberg ("**Goldberg,**" a vocal Kahanist settler in Tapuah who was permanently stripped of his weapons by the Israeli government in 1994,[68] and today is a frequent guest on a Kahanist podcast hosted by convicted January 6 insurrectionist Elliot Resnick).[69]

Chazen is listed as director of a second 501(c)(3) tax-exempt organization called the Charity of Light Fund, EIN: 22-3841434. The Charity of Light raises funds for the Daughter of Israel, also presided over by Kroizer, and which espouses Kahane's miscegenation ideology promising to rescue from Arab villages "Jewish girls, offering them shelter and bringing them back to their roots … through a rehabilitation process, both physical and spiritual which enables them to return to their own people."[70] Miscegenation is a core tenet today of the Lehava organization (**"Lehava**"), founded by Kahanist Benzion Gopstein ("**Gopstein**"), employing Marzel and Ben-Ari, sharing headquarters with Otzma Yehudit, and represented often in criminal proceedings by Ben Gvir.[71] In 2014, three members of Lehava were convicted for arson of an integrated Arab-Jewish school in Jerusalem – despite graffiti messages found at the scene of the crime of "Kahane was right," "Death to the Arabs," and "there is no coexistence with cancer," the U.S. State Department did not acknowledge this act as terrorism as related to Kahane Chai.[72] That same year, at a memorial ceremony for Kahane, Gopstein gave a speech where he referred to "the enemies within us" as cancer and referred to the al-Aqsa mosque as "the largest cancer growth" – the U.S. State Department still did not designate Lehava as a Kahane Chai alias.[73]

T'ruah, a human rights organization, has filed complaints with the IRS and campaigned for transparency about the Central Fund of Israel, which used U.S. fundraising to give cash payments to Israelis convicted of terrorism via Honenu; the Charity of Light Fund; the Jewish Communal Fund, which sends U.S. fundraising to Lehava; and the Jewish National Fund-USA, which sends U.S. fundraising to illegal West Bank settlements.[74] The IRS has taken no permanent action.

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[68] Clyde Haberman, *Israel votes ban on Jewish groups linked to Kahane,* THE NEW YORK TIMES, (14 March 1994), https://www.nytimes.com/1994/03/14/world/israel-votes-ban-on-jewish-groups-linked-to-kahane.html.
[69] Yeshivat *HaRa'ayon HaYehudi* Gala Banquet (3 November 2012) https://www.facebook.com/events/shirat-yerushalayim-hall-64-kanfei-nesharim-st-givat-shaul-jerusalem/yeshivat-haraayon-hayehudi-gala-banquet-for-its-english-speaking-supporters/113493318804802/.
[70] Rabbi Mordechai Eliahu & Rabbi Ovadia Yossef, *The Charity of Light*, http://daughterofisrael.org/endorsements/.
[71] Ari Engelberg, *Fighting intermarriage in the Holy Land: Lehava and Israeli ethnonationalism*. J ISRAELI HIST. 35(2):229-247, 2018.
[72] Raoul Wootliff, *Man who torched Arab-Jewish school sentenced to 3 years,* THE TIMES OF ISRAEL, (1 December 2015), https://www.timesofisrael.com/man-who-torched-arab-jewish-school-sentenced-to-3-years/.
[73] Michael Horovitz, *Jewish extremist Bentzi Gopstein found guilty of incitement to anti-Arab racism*, THE TIMES OF ISRAEL, (14 January 2024), https://www.timesofisrael.com/jewish-extremist-bentzi-gopstein-found-guilty-of-incitement-to-anti-arab-racism/.
[74] T'ruah website: https://truah.org/issue/funding-transparency/.

VI. Kahanists today have been legitimized via lawfare and political affiliations and the Kahanist ideology has been incorporated into mainstream Israeli politics.

Kahanists have legitimized themselves today through "lawfare." Weinstein, the leader of JDL in Canada, announced the establishment of a new group of "lawyers, researchers, and security professionals" in 2021, which would "use legal tools and cooperate with local and federal governments."[75] Weinstein's Youtube webseries, Never Again Live, indicates his ideology remains firmly rooted in Kahanism. Leitner, former JDL and TNT terrorist, and his wife Nitsana Darshan-Leitner, formed legal defense center Shurat HaDin, a litigious campaigner using foreign courts to threaten corporations, non-profits, and universities against perceived anti-Israel bias whose "explicit credo is to bankrupt through litigation groups that it perceives to be terrorist threats."[76] Shurat HaDin receives funding from the Central Fund of Israel, a 501(c)(3) organization against which T'ruah has filed complaints with the IRS.[77]

Ben Gvir is a Kahanist who has very successfully legitimized himself and his far-right ideology through politics, declaring that Kahanists have "gone mainstream" and that the Knesset is "adopting the beliefs of Kahane" and now "understand that all those things he said, he was right."[78] Despite a 2007 conviction for supporting a terrorist organization and incitement to racism when he carried signs reading "expel the Arab enemy" and "Kahane was right: the Arab MKs are the fifth column," today he serves as Israel's Minister of National Security and the leader of the Otzma Yehudit party.[79] Smotrich, another settler arrested for criminal behavior during the 2005 Gaza anti-disengagement movement, now serves as Israel's Minister of Finance and the leader of the Religious Zionist party. Yitzhak Kroizer, son of Rabbi Kroizer who presides over Kahane's yeshiva *HaRa'ayon HaYehudi,* serves in the Knesset representing Otzma Yehudit. Likud, Israel's plurality party in the Knesset, formed a coalition with Otzma Yehudit, the Religious Zionist party, and United Torah Judaism in November 2022.

The far-right Israeli government has had success in implementing tenets of the Kahanist ideology that were once associated with terrorist motivations. In February 2023, the Prime Ministerial security cabinet granted retroactive legalization to a dozen West Bank settlements and announced

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[75] Stephen Ellis, *The long overdue death of the Jewish Defense League,* CANADIAN DIMENSION, (21 August 2021), https://canadiandimension.com/articles/view/the-long-overdue-death-of-the-jewish-defence-league.
[76] *Shatsky v. Syrian Arab Republic*, 312 F.R.D. 219, 222 (D.D.C. 2015)
[77] Shurat HaDin website: https://israellawcenter.org/donate-check/
[78] Melanie Lidman, *1,000 mark 20th anniversary of Kahane's assassination,* THE JERUSALEM POST, (26 October 2010), https://www.jpost.com/israel/1000-mark-20th-anniversary-of-kahanes-assassination.
[79] Etgar Lefkovits, *Ben Gvir convicted of inciting to racism,* THE JERUSALEM POST, (25 June 2007), https://www.jpost.com/israel/ben-gvir-convicted-of-inciting-to-racism.

authorization of additional expansion.[80] On March 21, 2023, the Knesset amended the 2005 Disengagement Implementation Plan Law, rescinding the ban on Israelis from the evacuated settlements in the northern West Bank, which was signed into action by the IDF Central Command on May 20.[81] By August, 2023 had already become the most violent year for Palestinians in the West Bank since 2005.[82]

A key step in implementing far-right Kahanist plans is to weaken the power of the judiciary from protecting rights such as voting and free speech by passing a series of judicial reforms. In mid-2023, the Knesset passed the first stage into law – removing the power from the Supreme Court to "consider the reasonableness of a decision of the government."[83] The judicial reforms follow on the back of the controversial 2018 "nation state" law which, among other things, effectively disqualified "values of inclusive citizenship guaranteeing the equal membership" of Arab Israelis.[84] Other recent legislation bringing Israel closer to Kahane's vision include a proposed law punishing proselytizing Christianity with a year in prison, legalizing the death penalty for terrorism convictions against Israeli citizens only, banning bread in hospitals during Passover, and expanding the jurisdiction of rabbinical courts to match that of the secular justice system.[85] The government is in the process of forming an all-volunteer national guard operating under authority of Ben Gvir in his capacity as Minister of National Security – opponents have described this as Ben Gvir's personal militia that answers to him rather than the police or the military.[86] When the U.S. considered sanctioning the Netzah Yehuda battalion of the Israeli military under the Leahy Law,[87] due to numerous, widespread reports of gross human rights violations, Ben Gvir stated the battalion would be absorbed into the Ministry of National Security as

[80] United Nations Security Council *Statement by the President of the Security Council* (20 February 2023) S/PRST/2023/1.
[81] Pnina Sharvit Baruch, & Udi Dekel, *The return to Homesh: a sign of what lies ahead* (8 June 2023) INSS Insight No. 1736, Tel Aviv University Institute for National Security Studies.
[82] Tor Wennesland, *Security Council Briefing,* (21 August 2023), https://unsco.unmissions.org/briefing-security-council-situation-middle-east-delivered-special-coordinator-tor-wennesland.
[83] Ruth Levush, *Israel: Legislation Abolishes Reasonableness as a Standard for Judicial Review of Government's Decisions.* 2023. Web Page. https://www.loc.gov/item/global-legal-monitor/2023-10-24/israel-legislation-abolishes-reasonableness-as-a-standard-for-judicial-review-of-governments-decisions/ .
[84] Honaida Ghanim, *Israel's nation-state law: hierarchized citizenship and Jewish supremacy.* CRITICAL TIMES. 4(3):565-576, 2021.
[85] Sam Sokol, *Not just judicial overhaul: six other radical laws on the Israeli government's wish list,* HAARETZ, (30 March 2032), https://www.haaretz.com/israel-news/2023-03-30/ty-article/.premium/not-just-judicial-overhaul-six-other-radical-laws-on-the-israeli-governments-wish-list/00000187-31b5-da89-a39f-3db559d10000.
[86] Tia Goldenberg, *Israel advances national guard force for right-wing minister,* YAHOO NEWS CANADA, (2 April 2023), https://ca.style.yahoo.com/news/israeli-government-advances-ben-gvirs-150704368.html.
[87] Michael A. Weber (25 April 2024) *Global human rights: security forces vetting.* (CRS Report No. IF10575).

the national guard.[88] Israel is progressing rapidly towards confirming Kahane's vision that Israel can be either a Jewish state or a western democracy, but certainly not both.[89]

VII. Kahanists on the fringe manifest the ideology by "settler violence."

Israeli settlements and outposts in the West Bank are illegal under international law, and the United Nations Security Council has condemned all measures taken by Israel including "the construction and expansion of settlements, transfer of Israeli citizens, confiscation of land, demolition of homes and displacement of Palestinian civilians" and demanded that "Israel immediately and completely cease all settlement activities in the occupied Palestinian territory."[90] The violence perpetrated by settlers is extreme, daily, and almost always along the same ideological lines espoused by Kahane of Israeli expansion and non-Jew expulsion.

In the summer of 2015, settlers firebombed a home in the West Bank town of Duma, killing a couple and their 18-month-old child, and badly burning their 5-year-old son. Amiram Ben-Uliel ("**Ben-Uliel**") was convicted for the triple murder and sentenced to life in prison. A minor accomplice represented by Ben Gvir was also later convicted.[91] Just one year prior to the murders, Ben-Uliel was identified in an internal police investigation seeking to map the relationships of the main violent settlers to monitor and assist in later investigations.[92] Six months after the murders, a video surfaced from the wedding of Tapuah settler Goldberg's daughter where the guests stabbed and burned photos of the Duma family, including the slain toddler.[93] Six people including the groom, at least some of whom were represented by Ben Gvir, were later convicted of incitement to terrorism.[94] A fundraiser aiming

[88] Staff Writer, *Israel aghast as U.S. said poised to sanction IDF unit with history of abuses*, THE TIMES OF ISRAEL, (21 April 2024), https://www.timesofisrael.com/israel-aghast-as-us-said-poised-to-sanction-notorious-idf-unit-netanyahu-a-moral-low/.
[89] Rabbi Meir Kahane, *Uncomfortable Questions for Comfortable Jews,* Lyle Stuart Inc. (1987) https://archive.org/details/uncomfortableque00kaha/page/n4/mode/1up pg 45.
[90] United Nations Security Council *Resolution 2334* (23 December2016) S/RES/2334.
[91] David M. Halbfinger & Adam Rasgon, *Israeli settler found guilty of murdering Palestinian family in 2015 arson*, THE NEW YORK TIMES, (18 May 2020), https://www.nytimes.com/2020/05/18/world/middleeast/israel-amiram-ben-uliel-guilty.html.
[92] Gidi Weitz & Chaim Levinson, *Suspect arrested for deadly arson attack on Palestinians was top police target for a year,* HAARETZ, (26 February 2016), https://www.haaretz.com/israel-news/2016-02-26/ty-article/.premium/duma-suspect-was-top-police-target-for-a-year/0000017f-dba9-d3ff-a7ff-fba9a9630000.
[93] Elisha Ben Kimon, Elior Levy, Attila Somfalvi, *Police investigating wedding video on suspicion of incitement,* YNET NEWS, (25 December 2015), https://www.ynetnews.com/articles/0,7340,L-4743786,00.html.
[94] Staff Writer *Groom, 6 guests at infamous Jewish 'hate wedding' convicted of incitement to terror,* THE TIMES OF ISRAEL, (27 April 2022), https://www.timesofisrael.com/groom-6-guests-at-infamous-jewish-hate-wedding-convicted-of-incitement-to-terror/.

to free Ben-Uliel has raised close to half a million dollars and a member of the Knesset from the Otzma Yehudit party refers to him as a "holy righteous man" in her plight to have him released.[95]

Settler targets are not always Palestinians; they have also attacked government officials and Israeli peace activists. In 2008, Zeev Sternhall, a political science professor at Hebrew University who publicly criticized the West Bank settlements, was wounded when a pipe bomb blew up outside his home in Jerusalem.[96] Law enforcement attributed the bombing to right-wing extremists when they found flyers in the neighborhood advertising rewards for killing members of Peace Now – a serial terrorist was later charged and convicted for the Sternhall bombing among several other crimes. In 2014 in Yitzhar, a settlement known for extremist violence, hundreds of settlers attacked Border Police and destroyed an army outpost, requiring law enforcement to establish a permanent police station to better monitor and control the settlement.[97]

VIII. Executive Order 14115 addresses "leaderless resistance" better than organization designation but has many shortcomings.

In 2024, the U.S., the UK, the EU, as well as Canada, France, Spain and New Zealand began sanctioning violent West Bank settlers. The U.S. achieved the sanctions through Executive Order 14115, which stipulated that all property in the U.S., within the possession or control of the U.S. including a foreign branch, is blocked and may not be transferred, paid, exported or withdrawn to persons determined by the Secretary of State to be responsible for or complicit in actions threatening the peace, security, and stability of the West Bank.[98] Unlike the State Department's FTO designation, E.O. 14115 does not make it a crime to materially support the sanctioned persons, nor are the sanctioned persons banned from the U.S. In December 2023, the State Department had issued a press release announcing a new visa restriction policy targeting "individuals believed to have been involved in undermining peace, security, or stability in the West Bank," but it is unclear which individuals are affected and how the policy is being implemented.[99]

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[95] Alexander Fulbright, *Far-right coalition MK calls Israeli killer of Palestinian family 'holy righteous man',* THE TIMES OF ISRAEL, (20 September 2023), https://www.timesofisrael.com/far-right-coaliton-mk-calls-israeli-killer-of-palestinian-family-holy-righteous-man/.

[96] Rory McCarthy, *Israeli peace advocate attacked,* THE GUARDIAN, (29 September 2008), https://www.theguardian.com/world/2008/sep/26/israelandthepalestinians.middleeast1.

[97] Yaniv Kubovich & Chaim Levinson, *Police to set up shop in radical Yitzhar settlement*, HAARETZ, (18 May 2014), https://www.haaretz.com/2014-05-18/ty-article/.premium/yitzhar-to-get-its-own-police-station/0000017f-e814-df5f-a17f-fbde9c360000.

[98] Presidential Documents, 5 February 2024, *Federal Register* 89(24):7605-08.

[99] Antony J. Blinken, *Announcement of Visa Restriction Policy to Promote Peace, Security, and Stability in the West Bank*. 5 December 2023. Webpage. https://eg.usembassy.gov/announcement-of-visa-restriction-policy-to-promote-peace-security-and-stability-in-the-west-bank/.

The UK designated violent West Bank settlers under the Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680) by freezing funds and economic resources for persons involved in activities constituting a violation of another individual's right to life or cruel, inhuman, or degrading treatment of another individual, as well as banning said person from the UK.[100]

The Council of the EU sanctioned individuals and entities under the EU Global Human Rights Sanctions Regime who are responsible for serious human rights abuses against Palestinians, including torture and other cruel, inhuman, or degrading treatment, which results in an asset freeze, prohibition on funding, and a travel ban.[101]

Name	U.S.	UK	EU
Bar Yosef, Zvi	√	√	
Ben Pazi, Neriya	√		√
Chasdai, David Chai	√		
Ettinger, Meir			√
Federman, Ely		√	
Federman, No'am		√	
Gopstein, Benzion	√		
Hilltop Youth		√	√
Lehava		√	√
Levi, Eden		√	
Levy, Yinon	√	√	√
Moshe's Farm	√		
Mount Hebron Fund	√		
Sharvit, Moshe	√	√	
Shlom Asiraich	√		
Tanjil, Einan	√		
Yered, Elisha		√	√
Zicherman, Shalom	√		
Zvi's Farm	√		

*current as of 9 May 2024

The sanctions have three obvious flaws – (i) the violent individuals and entities are not aligned indicating a lack of collaboration among close allies, (ii) the U.S. sanctions are imposed under an executive order that can be overturned by a successive president rather than a human rights statute; and (iii) with the exceptions of Federman, Gopstein, and Ettinger, active Kahanist leaders are not sanctioned. A less obvious flaw, but crucial nonetheless, is that the sanctions rely on identification and investigation by Israel rather than an independent or neutral third-party. A relatively simple improvement to the sanctions list that could be effectuated quickly and without additional administrative agency input beyond what is already provided is to add the non-profit organizations funding West Bank settlements that have already been investigated by the IRS – including the

[100] HM Treasury Office of Financial Sanctions Implementation (12 February 2024) *Financial Sanctions Notice*
[101] Council of the EU Press Release (19 April 2024) *Extremist settlers in the occupied West Bank and East Jerusalem*

American Friends of Yeshivat *HaRa'ayon HaYehudi,* the Charity of Light Fund*,* Honenu, the Jewish Communal Fund, and the Jewish National Fund-USA.

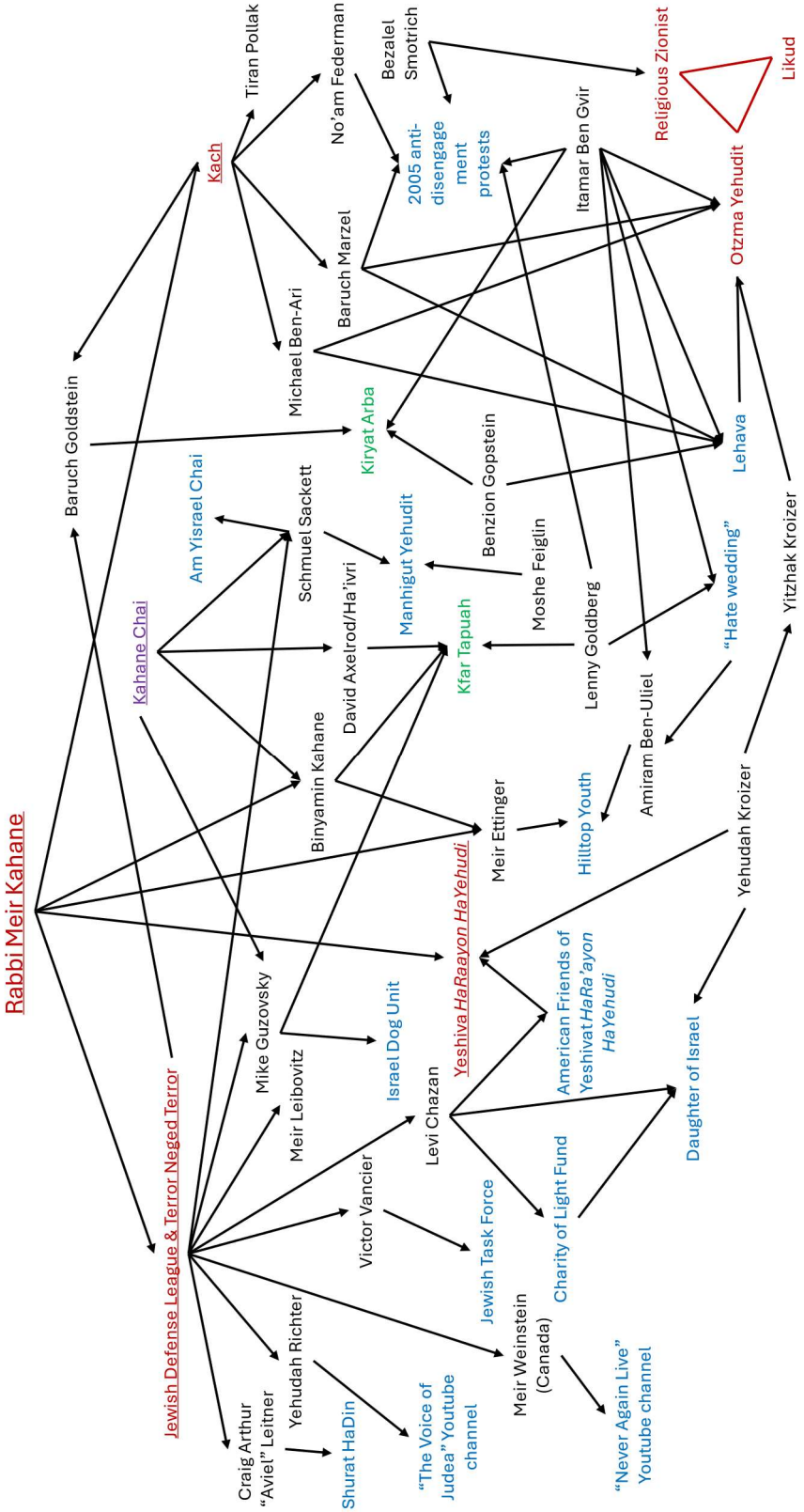
The response from Israel has been reminiscent of the "price tag" attack strategy practiced by the Hilltop Youth, whereby violent settler youth punish Palestinians in response to government action to which they disapprove.[102] Addressing the EU sanctions, Smotrich said Israel's retaliation would be to strengthen and establish "settlements in all parts of the Land of Israel"[103] and in response to the U.S. sanctions, Smotrich threatened to collapse the Palestinian economy by withholding his authorization on lawsuit protection documents for Israeli banks that fund the Palestinian Authority.[104] In a similar style but on a separate matter, the Israeli government threatened to freeze the transfer of tax revenues to the Palestinian Authority leading to its collapse if the International Criminal Court issues arrest warrants for any Israeli officials.[105] Under 18 U.S.C. §2331, international terrorism constitutes activities that are "dangerous to human life" that "appear to be intended … to influence the policy of a government by intimidation or coercion" occurring primarily outside of the United States. The government of Israel has adopted the ideologies and techniques that were once classified as "terrorism" by the United States and now acts with impunity – sanctions against individual terrorists and terrorist organizations will ultimately be ineffective because they do not address the underlying enablement by a government that amounts to a state-sponsor of terrorism.

[102] Dion Nissenbaum, *Radical Jewish settlers threaten to fight Israeli army,* MCCLATCHY, (3 December 2008), http://www.mcclatchydc.com/2008/12/03/56995/radical-jewish-settlers-threaten.html.
[103] Jonathan Lis & Ben Samuels, *EU 'unanimously' agrees to impose sanctions against violent Israeli West Bank settlers,* HAARETZ, (18 March 2024), https://www.haaretz.com/world-news/europe/2024-03-18/ty-article/.premium/eu-unanimously-agrees-to-impose-sanctions-against-violent-israeli-west-bank-settlers/0000018e-52c2-dc23-a3bf-daf760d20000.
[104] Ariel Kahana, *Following Biden's sanctions against settlers: Smotrich initiates damage to the Palestinian economy,* ISRAEL HAYOM, (14 March 2024), https://www.israelhayom.co.il/news/geopolitics/article/15425756.
[105] Barak Ravid, *Israel tells U.S. it will punish Palestinian Authority if ICC issues warrants,* AXIOS, (1 May 2024), https://www.axios.com/2024/05/01/us-israel-palestinian-authority-icc-arrest-warrant.

Appendix A
Kahanist Aliases

Kahane Chai	Kach
Repression of Traitors	Dikuy Bogdim
DOV	State of Judea
Committee for the Safety of the Roads	Sword of David
Judea Police	Kahane Lives
Kfar Tapuah Fund	The Judean Voice
Forefront of the Idea	The Qomemiyut Movement
The Yeshiva of the Jewish Idea	The Judean Legion
The Way of the Torah	KOACH
New Kach Movement	Newkach.org
Kahane	Yeshivat HaRav Meir
International Kahane Movement	Kahane.org
Kahane.net	Kahanetzadak.com
Kahane Tzadak	Hatikva Jewish Identity Center
The Rabbi Meir David Kahane Memorial Fund	Friends of the Jewish Idea Yeshiva
Judean Congress	Jewish Legion
Committee Against Racism and Discrimination	The Voice of Judea
Meir's Youth	American Friends of Yeshivat Rav Meir
American Friends of the United Yeshiva Movement	No'ar Meir

Appendix B
Network of Kahanism



Appendix C

Notable Figures

Rabbi Meir Kahane	Founder of JDL, Kach and Yeshiva *HaRa'ayon HaYehudi*
Yehudah Richter	Member of JDL and TNT; runs Youtube channel called "The Voice of Judea"
Levi Chazen	Member of JDL and TNT; director of American Friends of Yeshivat *HaRa'ayon HaYehudi* and Charity of Light Fund; hosted a fundraiser for Kahane Chai in 2012 in Israel
Meir Leibovitz	Member of JDL and TNT
Craig Arthur Aviel Leitner	Member of JDL and TNT; founder of lawfare group Shurat HaDin
Mike Guzovsky (Yekutiel Ben-Yaakov)	Member of JDL and TNT; leader of Kahane Chai in the U.S.; founder of settlement Kfar Tapuah; hosted a fundraiser for Kahane Chai in the U.S.; leader of the Hatikva Jewish Identity Center; runs the Israel Dog Unit
Baruch Marzel	Leader of Kach; founder of Otzma Yehudit; organizer of 2005 anti-disengagement movement; was employed at Lehava
No'am Federman	Leader of Kach; arrested for attempting to bomb a school and hospital in 2002; organizer of 2005 anti-disengagement movement
Tiran Pollak	Leader of Kach
Binyamin Ze'ev Kahane	Leader of Kahane Chai; founder of settlement Kfar Tapuah; hosted a fundraiser for Kahane Chai in the U.S.
David Axelrod/Ha'ivri	Leader of Kahane Chai; founder of settlement Kfar Tapuah
Michael Ben-Ari	Member of Kach; in the Knesset from 2009-2012; founder of Otzma Yehudit; banned from the U.S. in 2009 and 2012; present at Kahane Chai fundraiser in 2012 in Israel; was employed at Lehava
Itamar Ben Gvir	Member of Kach; founder of Otzma Yehudit; resident of Kiryat Arba; organizer of 2005 anti-disengagement movement; attorney for Lehava, Gopstein, Ben-Uliel, and "hate wedding"; Israel's current Minister of National Security
Meir Ettinger	Kahane's grandson; early member of the Hilltop Youth; involved in 2005 anti-disengagement movement
Baruch Goldstein	Member of JDL and Kach; murdered 29 Palestinians in Hebron; resident of Kiryat Arba
Yigal Amir	Member of Eyal; murdered Yitzhak Rabin
Bezalel Smotrich	Involved in 2005 anti-disengagement movement; arrested for conspiring to blow up a highway; Israel's current Minister of Finance
Rabbi Shmuley Boteach	Received death threats from Kahane Chai online
Anthony Blinken	Secretary of State who revoked Kahane Chai terrorist designation
Rabbi Yehuda Kroizer	Rabbi of Yeshiva *HaRa'ayon HaYehudi*; presides over miscegenation group Daughter of Israel
Meir Weinstein	Leader of JDL Canada; founder of Kahanist group Israel Now; present at Kahane Chai fundraiser in 2012 in Israel
Baruch Ben Yosef	Suspect in the 1985 JDL assassination of Alex Odeh; present at Kahane Chai fundraiser in 2012 in Israel;
Lenny Goldberg	Resident of Kfar Tapuah; present at Kahane Chai fundraiser in 2012 in Israel; daughters Moriah and Roni arrested during 2005 anti-disengagement protests; son-in-law convicted of terror incitement from "hate wedding" in 2015
Elliot Resnick	Convicted January 6, 2021 insurrectionist; Kahanist podcast host
Benzion Gopstein	Founder of Lehava; councilmember for Kiryat Arba
Nitsana Darshan-Leitner	Wife of Craig Arthur Aviel Leitner; attorney at Shurat HaDin
Yitzhak Kroizer	Rabbi Kroizer's son; member of Knesset in Otzma Yehudit
Amiram Ben-Uliel	Sentenced to life in prison for Duma triple murder
Zeev Sternhall	Peace Now activist and political science professor at Hebrew University; West Bank settlers bombed his home